

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 BENJAMIN F. J. NEMEC
5 Assistant Federal Public Defender
6 Nevada State Bar No. 14591
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Ben_Nemec@fd.org

12 Attorney for Fabian Reyes-Sauza

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 FABIAN REYES SAUZA,

19 Defendant.

20 Case No. 2:21-mj-00583-EJY

21 **STIPULATION TO CONTINUE
22 BENCH TRIAL**
23 (First Request)

24 IT IS HEREBY STIPULATED AND AGREED, by and between
25 Christopher Chiou, Acting United States Attorney, and Rachel Kent, Special
26 Assistant United States Attorney, counsel for the United States of America, and
Rene L. Valladares, Federal Public Defender, and Benjamin F. J. Nemec,
Assistant Federal Public Defender, counsel for Fabian Reyes-Sauza, that the
bench trial currently scheduled for October 20, 2021 at 9:00 am, be vacated and
continued to a date and time convenient to the Court, but no sooner than sixty
(60) days.

This Stipulation is entered into for the following reasons:

1. Counsel needs additional time to review discovery and consult with Mr. Reyes-Sauza to adequately prepare for trial/or possible negotiations with the Government.
2. Mr. Reyes-Sauza is not incarcerated and agrees to this continuance.
3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for a continuance of the Bench Trial.

DATED this 19th day of October 2021.

RENE L. VALLADARES
Federal Public Defender

/s/ *Benjamin F. J. Nemec*
By _____
BENJAMIN NEMEC
Assistant Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Rachel Kent
By _____
RACHEL KENT
Special Assistant United States
Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
FABIAN REYES-SAUZA,
Defendant.

Case No. 2:21-mj-00583-EJY

ORDER

IT IS THEREFORE
on Wednesday, October 2
December 29, 2021 at the

DATED this 19th day of October 2021.

Rayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE